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FILED

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

APR 1 6 2018

UNITED STATES OF AMERICA,

Plaintiff,

Vs.

18 U.S.C. §§ 1153 and 1112:
Involuntary Manslaughter.

Defendant.

## INFORMATION

The United States Attorney charges:

On or about December 9, 2017, in Indian Country, in San Juan Country, in the District of New Mexico, the Defendant, **JEROME DAYZIE**, an Indian, unlawfully killed John Doe, while in the commission of an unlawful act not amounting to a felony, that is while: (1) violating New Mexico's statute prohibiting driving under the influence of intoxicating liquor, N.M. Stat. Ann. § 66-8-102 (1978), by driving a vehicle and as the result of drinking liquor, being less able to the slightest degree, mentally and physically, and both, to exercise the clear judgment and steady hand necessary to handle a vehicle with safety to the person and the public; and (2) violating New Mexico's statute prohibiting driving under the influence of intoxicating liquor, N.M. Stat. Ann. § 66 8-102 (1978), by driving a vehicle with a blood alcohol concentration of eight one hundredths and more within three hours of driving the motor vehicle, resulting from alcohol consumed before or while driving the vehicle; and (3) violating New Mexico's statute prohibiting reckless driving, N.M. Stat. Ann. § 66-8-113 (1978), by driving a motor vehicle without due caution and circumspection and with a wanton and reckless disregard for human life when he knew and should have known that his conduct imperiled the lives of others.

In violation of 18 U.S.C. §§ 1153 and 1112.

JOHN C. ANDERSON

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